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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TONYA HALE,)	Case No.: 2:19-cv-00780-JCM-VCF
)	
Plaintiff,)	
)	
vs.)	STIPULATION AND ORDER TO
)	EXTEND TIME FOR DEFENDANT
)	TO FILE ITS REPLY IN SUPPORT
THE COSMOPOLITAN OF LAS)	OF ITS MOTION FOR SUMMARY
VEGAS; NV PROPERTY 1, LLC dba)	JUDGMENT
THE COSMOPOLITAN OF LAS)	(First Request)
VEGAS, a Nevada Limited Liability)	
Company; RICHARD SHERMAN, an)	
individual,)	
)	
Defendants.)	

IT IS HEREBY STIPULATED AND AGREED by and between the parties' respective counsels of record pursuant to LR 6-1 and LR 6-2 that Defendant's Reply in Support of its Motion for Summary Judgment ("Reply"), which is currently due on July 12, 2021, will be continued to July 28, 2021. This is the first request to continue the due date for Defendant's Reply.

Said continuance is being requested in order to provide Defendant adequate time to respond to Plaintiff's Response to Defendant's Motion for Summary Judgment (ECF No. 64). Undersigned counsel is court appointed pro bono counsel with the Children's Attorney Project for children in foster care. One of her clients who is a ward of the State of Nevada

1 is currently experiencing critical health and placement issues and has been admitted to the
2 hospital multiple times in recent weeks for acute treatment. As counsel for the minor child,
3 the undersigned has to attend multiple meetings with medical providers, therapists, and
4 caseworkers and is in the process of preparing for an evidentiary hearing which is scheduled
5 for July 8, 2021 in family court. These life and death matters have taken priority.
6 Accordingly, the undersigned respectfully requests an extension up to and including July
7 28, 2021 to prepare a reply in support of Defendant's Motion for Summary Judgment.

8 Plaintiff does not object to the requested extension. The parties assure the Court this
9 request is not being made for the purpose of delay.

10 Dated this 7th day of July, 2021.

11 LAW OFFICES OF MICHAEL P. BALABAN

FISHER & PHILLIPS LLP

12
13 /s/ Michael P. Balaban, Esq.

/s/ Lisa A. McClane, Esq.

14 Michael P. Balaban, Esq.
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Attorney for Plaintiff

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16
17 **ORDER**

18 **IT IS SO ORDERED.**

19 
UNITED STATES DISTRICT JUDGE

20 July 9, 2021

21 DATED
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